

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

ALAMEDA RESEARCH LLC, FTX
TRADING LTD., WEST REALM SHIRES,
INC., AND WEST REALM SHIRES
SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v.

DANIEL FRIEDBERG,

Defendant.

ALAMEDA RESEARCH LTD. and FTX
TRADING LTD.,

Plaintiffs,

- against -

PLATFORM LIFE SCIENCES INC., LUMEN
BIOSCIENCE, INC., GREENLIGHT
BIOSCIENCES HOLDINGS, PBC,
RIBOSCIENCE LLC, GENETIC NETWORKS
LLC, 4J THERAPEUTICS INC., LATONA
BIOSCIENCES GROUP, FTX FOUNDATION,
SAMUEL BANKMAN-FRIED, ROSS
RHEINGANS-YOO, and NICHOLAS
BECKSTEAD,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50419 (JTD)

Adv. Pro. No. 23-50444 (JTD)

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
OCTOBER 24, 2023, AT 10:00 A.M. (ET), BEFORE THE HONORABLE JOHN T.
DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM NO. 5, WILMINGTON, DELAWARE 19801**

**ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY
PRESENT IN THE COURTROOM. ANY NON-PARTICIPANT MAY VIEW
THE HEARING VIA ZOOM BY REGISTERING IN ADVANCE AT THE LINK BELOW
BY OCTOBER 24, 2023 AT 8:00 A.M. (ET)**

Non-participants, please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJIsduCrrD0tHNL42xMnP-KaBNd7d1WmURg>

**After registering your appearance by Zoom, you will receive a confirmation
email containing information about joining the hearing.**

Topic: FTX Trading Ltd., *et al.* - Case No. 22-11068 (JTD)

When: October 24, 2023 at 10:00 a.m. (ET)

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

ADJOURNED MATTERS:

1. [Notice of Pretrial Conference in an Adversary Proceeding \[*Alameda Research LLC et al. v. Friedberg*, Adv. No. 23-50419 \(JTD\) – Adv. D.I. 7, filed on July 26, 2023\]](#)

Status: This matter is adjourned to the omnibus hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

2. [Motion of 101 Second Street, Inc. for Allowance and Payment of Administrative Claim Pursuant to 11 U.S.C. §§ 503 \(b\)\(a\), and 507\(a\) \[D.I. 1802, filed June 29, 2023\]](#)

Status: This matter is adjourned to the hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

3. [Joint Omnibus Motion of the Debtors and the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 for an Order Authorizing the Issuance of Subpoenas for Discovery from Silicon Valley Accountants, Silvergate Bank, and Evolve Bank & Trust \[D.I. 1874, filed on July 17, 2023\]](#)

² Amended items appear in bold.

Status: This matter is adjourned to the hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

4. [Motion of Debtors to Enter Into, and Perform Their Obligations Under, the Reimbursement Agreements \[D.I. 2238, filed on August 23, 2023\]](#)

Status: This matter is adjourned to the hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

5. [United States Trustee's Motion to Compel the Ad Hoc Committee of Non-U.S. Customers of FTX.Com to Comply with the Court's Order Concerning the Verified Statement of Eversheds Sutherland \(US\) and Morris, Nichols, Arsht & Tunnell LLP Pursuant to Bankruptcy Rule 2019 \[D.I. 2745, filed on September 28, 2023\]](#)

Status: This matter is adjourned to the hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

6. [Motion of Island Air Capital and Paul F. Aranha for Relief from the Automatic Stay, to the Extent Applicable, and Related Relief \[D.I. 2664, filed on September 21, 2023\]](#)

Status: This matter is adjourned to the hearing scheduled for November 15, 2023 at 1:00 p.m. (ET).

RESOLVED MATTERS:

7. [Second Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof \[D.I. 2446, filed on September 6, 2023\]](#)

Status: On September 25, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

8. [Third Motion of Debtors for Entry of an Order Extending Deadline to File a Complaint to Determine Dischargeability of Certain Debts Pursuant to 11 U.S.C. § 1141\(d\)\(6\) \[D.I. 2734, filed on September 28, 2023\]](#)

Status: On October 16, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

9. [Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Examinations \[D.I. 2983, filed on October 3, 2023\]](#)

Status: **On October 20, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.**

10. [Debtors' Motion for Entry of and Order \(A\) Authorizing the Debtors to Enter into Settlement Agreement Resolving Certain Disputes with the BlockFi Debtors,](#)

(B) Approving the Settlement Agreement, and (C) Granting Related Relief [D.I. 2994, filed on October 4, 2023]

Status: On October 19, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

MATTERS GOING FORWARD:

11. Second Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers [D.I. 2508, filed on September 13, 2023]

Response Deadline: September 27, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. Media Intervenors' Objections to the Second Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers [D.I. 2712, filed on September 26, 2023]
- B. United States Trustee's Objection to Second Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers [D.I. 2725, filed on September 27, 2023]

Related Documents:

- A. Notice of Rescheduled Hearing Date [D.I. 3297, filed on October 17, 2023]
- B. Reply of the Debtors and the Official Committee of Unsecured Creditors in Support of Motion for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers [D.I. 3311, filed on October 19, 2023]
- C. Notice of Debtors' and the Official Committee of Unsecured Creditors' Exhibit List and Intent to Offer Witness Testimony at the Hearing on October 24, 2023 in Connection with the Second Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers [D.I. 3313, filed on October 19, 2023]

Status: This matter is going forward.

12. Debtors' Motion for Entry of an Order (I) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (II) Granting Related Relief [D.I. 2646, filed on September 19, 2023]

Response Deadline: September 27, 2023 at 4:00 p.m. (ET); extend to September 29, 2023 at 4:00 p.m. (ET) for the Office of the United States Trustee

Responses Received:

- A. [United States Trustee's Objection to Debtors' Motion for Entry of an Order \(I\) Granting Leave from Local Rule 3007-1\(f\) to Permit the Filing of Substantive Omnibus Objections and \(II\) Granting Related Relief \[D.I. 2748, filed on September 29, 2023\]](#)

Related Documents:

- A. [Notice of Rescheduled Hearing Date \[D.I. 3297, filed on October 17, 2023\]](#)
- B. [Debtors' Reply in Support of Motion for Entry of an Order \(I\) Granting Leave from Local Rule 3007-1\(f\) to Permit the Filing of Substantive Omnibus Objections and \(II\) Granting Related Relief \[D.I. 3310, filed on October 19, 2023\]](#)

Status: This matter is going forward.

- 13. [Emergent Debtor's Motion for Entry of an Order Approving Postpetition Financing and Granting Related Relief \[D.I. 3024, filed on October 6, 2023\]](#)

Response Deadline: At or prior to the hearing.

Responses Received: Informal comments received from the Office of the United States Trustee, FTX Debtors, Official Committee of Unsecured Creditors appointed in the FTX Debtors' Chapter 11 Cases, and BlockFi.

Related Documents:

- A. [Order Expediting Hearing and Shortening Objection and Notice Period with Respect to Emergent Debtor's Motion for Entry of an Order Approving Postpetition Financing and Granting Related Relief \[D.I. 3037, entered on October 10, 2023\]](#)
- B. [Notice of Emergent Debtor's Motion for Entry of an Order Approving Postpetition Financing and Granting Related Relief \[D.I. 3067, filed on October 10, 2023\]](#)
- C. [Notice of Rescheduled Hearing Date \[D.I. 3297, filed on October 17, 2023\]](#)
- D. [United States Trustee's Objection to Motion of the Emergent Debtor for Entry of an Order Approving Postpetition Financing and Granting Related Relief \[D.I. 3334, filed on October 23, 2023\]](#)

Status: **This matter is adjourned to a date to be determined.**

ADVERSARY MATTERS:

14. Motion of Platform Life Sciences, Inc., a Canadian Corporation, to Dismiss Complaint for Lack of Personal Jurisdiction Pursuant to Rule 12(b)(2) [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 35, filed on September 15, 2023]

Response Deadline: September 29, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. Plaintiffs' Opposition to Defendant Platform Life Sciences, Inc.'s Motion to Dismiss for Lack of Personal Jurisdiction [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 41, filed on September 29, 2023]

Related Documents:

- A. Declaration of Dr. Edward J. Mills in Support of Motion Under Rule 12(b)(2) to Dismiss Complaint for Lack of Personal Jurisdiction on Behalf of Platform Life Sciences, Inc., a Canadian Corporation [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 36, filed on September 15, 2023]
- B. Declaration of Matthew B. McGuire in Support of Plaintiffs' Opposition to Defendant Platform Life Sciences Inc.'s Motion to Dismiss the Complaint for Lack of Personal Jurisdiction [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 42, filed on September 29, 2023]
- C. Reply of Platform Life Sciences, Inc., a Canadian Corporation, to Plaintiffs' Opposition to Motion to Dismiss Complaint for Lack of Personal Jurisdiction Pursuant to Rule 12(b)(2) [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 45, filed on October 6, 2023]
- D. Supplemental Declaration of Dr. Edward J. Mills in Support of Motion Under Rule 12(b)(2) to Dismiss Complaint for Lack of Personal Jurisdiction on Behalf of Platform Life Sciences, Inc., a Canadian Corporation [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 46, filed on October 6, 2023]
- E. Notice of Filing Corrected Exhibit to Declaration of Matthew B. McGuire in Support of Plaintiffs' Opposition to Defendant Platform Life Sciences, Inc.'s Motion to Dismiss the Complaint for Lack of Personal Jurisdiction [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 47, filed on October 11, 2023]

- F. Notice of Rescheduled Hearing Date [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 52, filed on October 18, 2023]
- G. **Letter to the Honorable John T. Dorsey from Platform Life Sciences, Inc. Regarding Oral Argument Scheduled for October 24th at 10:00 a.m. (ET) on Motions to Dismiss [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 55, filed on October 23, 2023]**
- H. **Letter to the Honorable John T. Dorsey from the Debtors in Response to Platform Life Sciences, Inc.’s Letter Regarding the Hearing Scheduled for October 24, 2023, and the Pending Motions to Dismiss [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 56, filed on October 23, 2023]**

Status: At the direction of the Court, this matter is adjourned.

- 15. Motion of Platform Life Sciences, Inc., a Delaware Corporation, to Dismiss Complaint for Failure to State a Claim for Relief Pursuant to Rule 12(b)(6) [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 37, filed on September 15, 2023]

Response Deadline: September 29, 2023 at 4:00 p.m. (ET)

Responses Received:

- A. Plaintiffs’ Response to Platform Life Sciences, Inc.’s Motion to Dismiss for Failure to State a Claim [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 43, filed on September 29, 2023]

Related Documents:

- A. Notice of Rescheduled Hearing Date [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 52, filed on October 18, 2023]
- B. **Letter to the Honorable John T. Dorsey from Platform Life Sciences, Inc. Regarding Oral Argument Scheduled for October 24th at 10:00 a.m. (ET) on Motions to Dismiss [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 55, filed on October 23, 2023]**
- C. **Letter to the Honorable John T. Dorsey from the Debtors in Response to Platform Life Sciences, Inc.’s Letter Regarding the Hearing Scheduled for October 24, 2023, and the Pending Motions to Dismiss [*Alameda Research Ltd. et al. v. Platform Life Sciences Inc. et al.*, Adv. No. 23-50444 (JTD) – Adv. D.I. 56, filed on October 23, 2023]**

Status: At the direction of the Court, this matter is adjourned.

Dated: October 23, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*